

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

CARPENTERS' DISTRICT COUNCIL OF  
GREATER ST. LOUIS, et al.,

Plaintiffs,

v.

OLD STYLE ROOFING COMPANY,

Defendant.

Case No. 4:07CV59-JCH

**STIPULATION FOR ENTRY OF CONSENT JUDGMENT**

Come now the parties and stipulate as follows:

1. Judgment shall be entered in favor of plaintiffs and against defendant Old Style Roofing Company in the amount of \$32,945.43, which consists of delinquent contributions owed through February 28, 2007 in the amount of \$26,722.60, liquidated damages in the amount of \$5,344.52, interest in the amount of \$378.31, and attorneys' fees and court costs of \$500.00.

2. Execution on the judgment amount set forth in paragraph 1, above, shall be stayed so long as defendant complies with paragraphs 3 and 4, below.

3. Defendant shall make payments to plaintiffs pursuant to the following schedule:

- 1) \$9,582.40, which represents contributions for November 6, 2006 through December 25, 2006, shall be paid on or before March 18, 2007;
- 2) \$2,856.70 on or before April 18, 2007;
- 3) \$2,856.70 on or before May 18, 2007;
- 4) \$2,856.70 on or before June 18, 2007;
- 5) \$2,856.70 on or before July 18, 2007;
- 6) \$2,856.70 on or before August 18, 2007;
- 7) \$2,856.70 on or before September 18, 2007; and
- 8) \$500.00 on or before October 18, 2007.

4. Defendant shall submit its reports and contributions to the Carpenters Funds on or before the date due as set forth in the collective bargaining agreement to which defendant is party,

or to which defendant becomes party during the period set forth in paragraph 3, above, beginning with the contributions for the week ending March 4, 2007.

5. If defendant fails to make a payment when due pursuant to paragraph 3 above, or fails to submit its reports and contributions as required by paragraph 4, above, the entire judgment, less any payments made, shall become immediately due. If defendant complies with paragraphs 3 and 4, above, then payment of the amount referenced in paragraph 3 shall satisfy this judgment.

6. The parties acknowledge that this Stipulation is based upon unaudited reports submitted by defendant, and that if plaintiffs discover through an audit of defendant's records that additional amounts are owed, then plaintiffs shall be entitled to pursue the collection of such amounts.

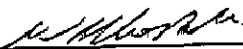
WHEREFORE, the parties stipulate to entry of a consent judgment according to the above terms.

HAMMOND, SHINNERS, TURCOTTE,  
LARREW & YOUNG, P.C.  
7730 Carondelet, Suite 200  
St. Louis, Missouri 63105  
Phone: (314) 727-1015  
Fax: (314) 727-6804

  
GREG A. CAMPBELL, #2774

Attorney for Plaintiffs

OLD STYLE ROOFING COMPANY  
1819 Smizer Station Road  
Fenton, Missouri 63026

By: 

Printed Name: William Z. Brooker

Title: President

SO ORDERED:

  
JEAN C. HAMILTON  
U.S. DISTRICT COURT JUDGE

Date: \_\_\_\_\_